

EXHIBIT 2

From: [Tucker, Jacob P.](#)
To: [Yetta G. Kurland](#); [Philon, Rachel S.](#)
Cc: [Lora Minicucci](#); [Hurd, Steven D.](#); [Bashinski, Hayden E.](#); [David B. Rankin](#); [Tala Alfogaha](#); [Jackie BeVier](#)
Subject: RE: Local 2507 et al v. City of New York 22cv10336 [rel20cv3389]
Date: Monday, July 14, 2025 2:08:29 PM

Yetta –

As we stated on the Friday call, and consistent with our Responses and Objections to your 30(b)(6) notice on the produced datasets, which the City served on July 9, 2025, the City will produce witnesses to provide non-privileged fact testimony regarding what database(s) and/or applications produced datasets were retrieved from, and what data are contained in each of those datasets, as well as the meaning of any abbreviations or codes in those datasets. In the spirit of cooperation, the City agreed, dependent of course on the witnesses' schedules, to prioritize these 30(b)(6) depositions before other witnesses that Plaintiffs noticed, to the extent possible. As we noted in response to your email this morning, we consent to holding off on discussing that schedule until after the judge rules on the discovery deadlines. We must note that we explicitly did not agree on Friday's call to provide dates for these depositions this week, but that is now beside the point because the parties are agreeing to wait until the Court rules on the schedule to have these discussions.

We do want to be very clear that, as we have said repeatedly, including on Friday's meet and confer, we only intend to produce witnesses once. We understand that Plaintiffs believe that some of the datasets in question are incomplete and that the City will need to supplement its production. As you know, we disagree, but the Court will make its decision. To avoid calling witnesses back for additional dates, we do not think it makes sense to set deposition dates until we have clarity from the Court on the various open discovery disputes. That said, if Plaintiffs are willing to agree that they will not seek subsequent depositions of the individuals the City produces concerning the datasets because Plaintiffs wish to take the 30(b)(6) depositions prior to resolution of these issues and completion of document discovery, we will consider this position and discuss with our client.

We do not know what Plaintiffs mean by their statement that they will "hold in abeyance the notices of deposition" for Ms. Heckler, Mr. Lin, and the individual who drafted the October 30, 2023 interrogatory responses. The City served its objections to those notices on July 9, 2025 and its position is unchanged.

Best,

Jake Tucker

Attorney at Law

[Proskauer](#)

Eleven Times Square

New York, NY 10036-8299
d 212.969.3857
f 212.969.2900

jtucker@proskauer.com

greenspaces
Please consider the environment before printing this email.

From: Yetta G. Kurland <kurland@kurlandgroup.com>
Sent: Friday, July 11, 2025 3:16 PM
To: Philion, Rachel S. <rphilion@proskauer.com>
Cc: Lora Minicucci <lminicuc@law.nyc.gov>; Hurd, Steven D. <shurd@proskauer.com>; Tucker, Jacob P. <jtucker@proskauer.com>; Bashinski, Hayden F. <HBashinski@proskauer.com>; David B. Rankin <DRankin@blhny.com>; Tala Alfoqaha <talfoqaha@blhny.com>; Jackie BeVier <jbevier@blhny.com>
Subject: Local 2507 et al v. City of New York 22cv10336 [rel20cv3389]

This email sent by kurland@kurlandgroup.com originated from outside the Firm.

Rachel,

This is to confirm pursuant to our discuss today that Plaintiffs will agree to hold in abeyance the notices of deposition for Annebell Heckler, Peter Lin and the individual responding to the CAD interrogatory until the 30(b)(6) witness on datasets is deposed. Defendant will prioritize a date or dates for deposition of the 30(b)(6) witness to answer questions on the datasets produced and provide dates for us next week for those depositions.

Yetta G. Kurland, Esq.
Senior Partner
The Kurland Group
Tel: 212 253-6911 || Fax: 212 614-2532
85 Broad Street, 18th Floor | NY, NY 10004
www.kurlandgroup.com

The information contained in this email is intended only for the personal and confidential use of the named individual or entity to whom it is addressed. This message may be an attorney-client communication, and as such it is privileged and confidential. If the reader of this message is not the intended recipient or an employee or agent responsible for delivering it to the intended recipient, you are hereby notified that you have received this document in error, and any review, dissemination, distribution or copying of this message or any part thereof is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone and return the original message to us by email.